# Amendments to the Drawings:

Enclosed is one Replacement Sheet containing Fig. 3. Fig. 3 has been amended to include hatchings as required by the Examiner.

No new matter has been added.

Attachment: One Replacement Sheet (Fig. 3)

#### REMARKS/ARGUMENTS

### Status of the Claims

Claims 1-5, 7-9, and 11-32 are pending in the application, among which claims 26-31 have been withdrawn from consideration in view of the prior Election Requirement. Claim 1 is the only independent claim and has been amended to incorporate additional features recited in original claims 6 and 10 and described in paragraph [0041] of applicants' published application (US 2007/0291503 A1). Claims 6 and 10 have been cancelled without prejudice or disclaimer. Newly added claim 32 is supported by paragraph [0041] of the published application.

No new matter has been added

#### Overview of the Office Action

The drawings have been objected to for allegedly lacking cross-hatching lines.

The specification has been objected to due to minor informalities.

Claims 1, 3-4, 6-8, 10-11, 15-16, 19, and 21-25 have been rejected under 35 U.S.C. \$102(e) as being anticipated by Kuan (US 6,860,620).

Claims 2, 9, 12-14, 17-18, and 20 have been rejected under 35 U.S.C. § 103(a) as unpatentable over Kuan.

Claim 5 has been rejected under 35 U.S.C. § 103(a) as unpatentable over Kuan and further in view of Becker (US 7,273,987).

#### Information Disclosure Statement (IDS)

The Office Action objected to applicants' IDS filed August 25, 2006 for failing to supply copies of the non-U.S. patent documents listed on the IDS. In response to the Examiner's above objection, applicants submit that the references listed on the IDS at issue were cited in the International Search Report (ISR) of the corresponding International PCT Application. Therefore, the non-U.S. patent documents on the IDS should be present in the USPTO file.

For the Examiner's convenience, applicants attach herewith copies of these non-U.S. patent documents, consideration of which is requested.

### Formality Issues

To advance the allowance of the subject application, applicants amended the Abstract as suggested by the Examiner. Accordingly, the objection of the Abstract has been overcome.

With respect to the objections to the disclosure, applicants refer to their Preliminary Amendment filed on August 25, 2006, in which the alleged informalities in the disclosure have been addressed. Therefore, the objections to the disclosure are moot.

### Patentability of the Claimed Invention

### Independent Claim 1

Independent claim 1 recites that "the thermally conductive layer and the electrical conductor tracks are positioned in a same plane of the flexible circuit board" and "the thermally conductive layer occupies at least 60 % of an area of said same plane."

In the Office Action, the Examiner interprets the heat sink tracks 122, 125 in Kuan as the claimed thermally conductive layer (see last paragraph on page 6 of the Office Action). Without admitting or disputing the above interpretation made in the Office Action, applicants submit that the above-recited features of independent claim 1 are not taught by Kuan because the heat sink tracks 122, 125 in Kuan are limited by the size of the LED's and cannot extend to the claimed area size recited in independent claim 1 based on the following detailed reasons.

Kuan teaches a device, in which the thermally conductive layer is given by a heat sink track 122 (see, e.g., Fig. 4 of Kuan). The heat sink tracks 122, 125 in Kuan occupy only a small area of the plane, on which the heat sink tracks 122, 125 and the electrical tracks 121, 123, 124, 126 are arranged. As Fig. 4 of Kuan shows, the heat sink tracks 122, 125 are arranged between the electrical tracks 121, 123, 124, 126 and are parallel to the corresponding anode and cathode

tracks 121, 123, 124, 126 (see, also, col. 3, II. 65-67). The anode and cathode terminals of a corresponding LED are attached to the corresponding electrical tracks 121, 123, 124, 126 (see, e.g., col. 3, II. 29-35).

As Kuan's heat sink tracks 122, 125 are arranged between the electrical tracks 121, 123, 124, 126, the distance between the anode and cathode terminals of the LED limits the space available for the heat sink tracks 122, 125. As such a distance is rather <u>small</u> for LEDs, Kuan cannot provide an area of the heat sink tracks 122, 125 to the extent as the claimed area size recited in independent claim 1. Therefore, Kuan does not teach or suggest "the thermally conductive layer and the electrical conductor tracks are positioned in a same plane of the flexible circuit board" and "the thermally conductive layer occupies at least 60 % of an area of said same plane," as expressly recited in independent claim 1.

Independent claim 1 is thus neither taught by nor obvious over Kuan. Accordingly, independent claim 1 is allowable over Kuan for at least the above reasons.

## B. <u>Dependent Claims 2-5, 7-9, and 11-32</u>

Claims 2-5, 7-9, and 11-32 depend, directly or indirectly, from allowable independent claim 1 and, thus, each is allowable therewith.

Becker was not cited to cure the deficiencies of the primary reference discussed above but to show additional limitation. Even if Becker was to show the additional limitations it is purported to show, the additional limitations do not cure the deficiencies discussed above.

In addition, these dependent claims include features that serve to even more clearly distinguish the claimed invention over the prior art of record.

#### Conclusion

Based on all of the above, it is respectfully submitted that the present application is now in proper condition for allowance. Prompt and favorable action to this effect and early passing of this application to issue are respectfully solicited. Should the Examiner have any comments, questions, suggestions or objections, the Examiner is respectfully requested to telephone the undersigned in order to facilitate reaching a resolution of any outstanding issues.

No fees or charges are required at this time in connection with the subject application. If any fees or charges are required, they may be charged to the PTO Deposit Account No. 03-2412.

> Respectfully submitted, COHEN PONTANI LIEBERMAN & PAVANE LLP

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Dated: October 7, 2010